

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

MONICA ABBOUD, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

AGENTRA, LLC, a Texas limited liability  
company,

Defendant.

Case No.: 3:19-cv-120

**CLASS ACTION COMPLAINT**

**JURY TRIAL DEMANDED**

**PLAINTIFF'S MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

Plaintiff Monica Abboud files this Motion for Leave to Proceed Without Local Counsel and states as follows:

1. Robert B. Kleinman was first admitted to practice law in the State of Texas on November 6, 2006. Mr. Kleinman was first admitted to the bar of the Northern District of Texas on June 19, 2008. Mr. Kleinman has been continuously licensed to practice law in the State of Texas for nearly twelve years and no disciplinary action has been brought against him.
2. Breanne V. Cope was first admitted to practice law in the State of Texas on May 5, 2011. Ms. Cope was first admitted to the bar of the Northern District of Texas on July 24, 2018. Ms. Cope has been continuously licensed to practice law in the State of Texas for over seven years and no disciplinary action has been brought against her.
3. Ms. Cope and Mr. Kleinman have familiarized themselves with the Local Rules of the Northern District of Texas.
4. On multiple occasions involving prior cases Mr. Kleinman has sought leave to proceed from this Court, and has always been given leave to do so.

5. Ms. Cope and Mr. Kleinman will be able to satisfy the duties normally required of local counsel. Specifically, Mr. Kleinman resides in Austin, Texas, less than 200 miles from this Court for any in person Court hearings or conferences on short notice, including emergency hearings that may need to be held within twenty-four hours.

6. Allowing Plaintiff to proceed without local counsel will avoid duplication of effort and spare her unnecessary expense.

**PRAYER**

7. For the reasons cited, Plaintiff Carolyn Carpenter respectfully requests that the Court allow her to proceed without designating local counsel.

Date: January 17, 2019

Respectfully Submitted,

**COMMON SENSE COUNSEL, LLP**

By: s/Robert B. Kleinman

Robert B. Kleinman

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

On January 17, 2019, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

By: s/Robert B. Kleinman  
Robert B. Kleinman